

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: February 26, 2018
2. Name of company(s) covered by this certification: Caryco Tech DBA: Axion Communications
3. Form 499 Filer ID: 830450
4. Name of signatory: Joseph Cary
5. Title of signatory: President
6. Certification:

I, Joseph Cary certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

Attachments:

Accompanying Statement explaining CPNI procedures

## Customer Proprietary Network Information (CPNI) Procedures

1. Caryco Tech does not sell, give or share CPNI data with 3<sup>rd</sup> party companies under any circumstances.
2. Caryco Tech employees only access CPNI data after receiving verbal or written authorization by an authorized contact listed on the Customer Contact Authority (see attached).
3. Caryco Tech provides CPNI information to only those end-users listed on the Customer Contact Authority.
4. Information is provided to authorized end-users only through one of the following methods:
  - a. Via email to the email address provided on the Customer Contact Authority.
  - b. By making an outbound phone call to one of the phone numbers listed on the Customer Contact Authority.
  - c. Via us mail address to an authorized end-user at the address of record.
5. The methods listed in point 4 are the only methods we support. We don't currently support password authentication.
6. We also do not currently make CPNI data available through a customer web portal. Customers must request CPNI data via phone or email to a Caryco Customer Service Agent.
7. The database that stores our CPNI data is protected via multiple layers of physical, network and software secure.
8. Access to CPNI records is only provided to specific employees.
9. Caryco Tech logs every time CPNI data is accessed. The log includes Time, Date, Customer Account Number, and employee username.